



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA ELECTRONIC MAIL

Mr. Kevin Smith
Environmental Compliance Specialist
Sunoco Partners
Marketing & Terminals, L.P.
100 Green Street
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RE: Alternative Testing Approval for Six Flood Pump Engines at SPMT Marcus Hook

Dear Mr. Smith:

The United States Environmental Protection Agency Region 3 (“EPA” or “R3” issued an approval for an alternative testing scenario to Sunoco Partners Marketing & Terminals, L.P. (“SPMT”) on August 1, 2013 and February 20, 2018 for six reciprocating internal combustion (“RICE”) compression ignition (“CI”) engines at the Marcus Hook Industrial Complex, located in Marcus Hook, PA (“facility” or “site”). The engines are used to power flood pumps that move large quantities of water at the facility during heavy rain events, preventing flooding of the facility and allowing access to pipe racks and cable trays at the site. EPA is in receipt of a letter dated December 17, 2020, requesting approval to complete testing on the engines, in the manner that was previously approved in 2013 and 2018.

Each of the six engines is subject to 40 C.F.R. Part 63 Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (“Subpart 4Z” or “RICE Rule”), because each is a stationary RICE located at a major source of hazardous air pollutants (HAPs). Furthermore, even though the six engines operate only during heavy rains, they do not meet the definition of an “emergency stationary RICE” in accordance with an October 12, 2011 letter issued by EPA Region 1 Air Programs Branch to the Massachusetts Water Resources Authority. To comply with the emissions standards in Subpart 4Z, Sunoco installed pollution reduction catalyst on each unit prior to the May 3, 2013 compliance date found at § 63.6595(a) for existing CI RICE.

The six engines were manufactured by Caterpillar, installed in 1994, and are arranged as three sets of two identical units, summarized below:

Designation	Horsepower (hp)/each engine	Pumping Capacity Gallons per Minute (GPM)
MP05-02 A & B	1745	23,500
MP05-04 A & B	2294	32,000
MP05-06 A & B	1184	42,650

In accordance with the two R3-issued approvals mentioned above, SPMT completed testing on 2A, 4B, and 6A on September 30, 2015; completed the testing on engines 2B and 6B on November 16, 2018; and completed the testing on engine 4A on December 20, 2018. All engines have demonstrated compliance with the emission limits in Subpart 4Z. SPMT now proposes to complete testing on all 6 engines during the



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summer of 2021, as proposed in its December 2020 letter. A test protocol has been submitted to PADEP because SPMT has secured a different testing contractor than the previous test programs.

Subpart 4Z at § 63.6615 and Table 3 requires Sunoco to complete testing on the engines every three years (or 8760 hours of operation). SPMT provided operational info in May 2021 demonstrating that no engine exceeded 500 hours of operation per year, so testing every 3 years is the appropriate compliance schedule.

Due to the sporadic and unpredictable nature of the operation of the engines based on rainfall, EPA's previous approvals allowed Sunoco to implement the following testing protocol alternatives:

1. EPA will allow notification for the performance test to take place by phone and email as soon as Sunoco is aware of the possibility of completing a test, rather than the 60-day written notification of intent to test required at § 63.6645(g) and by the requirements of the General Provisions at § 63.7.
2. EPA had previously approved testing of one engine from each identical set per performance test event; however, the December 2020 letter requests approval to test all six units. This increase in the number of units tested in one event is approved.
3. If after one year of the date of this letter there have not been enough rain events to complete testing on each engine, SPMT shall contact EPA Region 3 to discuss continuing the compliance period.
4. EPA will allow shortened test runs of 15 minutes each, rather than the three (1) hour runs required in the rule. Sunoco should perform three 15- minute test runs at 90% (or greater) of the design load for each engine being tested.

EPA Region 3 approves SPMT's request as outlined above in Items 1-4 for all six engine units at the Marcus Hook Terminal. Please be aware that while the rule specifies a 3-year testing schedule, Sunoco may complete its test at any time within that 3-year window, meaning it can complete its test upon receipt of this approval.

The final test reports will be submitted to EPA and Pennsylvania Department of Environmental Protection ("PADEP") as required by Subpart 4Z, the General Provisions of 40 C.F.R. Part 63, PADEP's rules and Sunoco's Title V Permit. Nothing in this approval alters the rules and requirements of Subpart 4Z as they apply to the Marcus Hook facility or any other SPMT site, for all other engines at this or other sites.

If you have questions or comments regarding this letter, please contact Erin Willard at (215) 814-2152 or by email at Willard.ErinM@epa.gov.

Sincerely,

Karen Melvin, Director
Enforcement and Compliance Assurance Division